

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

David Kraybill  
Plaintiff

v.

David Mains  
Donna Daniel  
Affordable Inmate Services, LLC.

Case No. 21-cv-1235-JPG

MOTION TO AMEND COMPLAINT AND TO SHOW CAUSE

Now comes the Plaintiff, David Kraybill, pro se, and moves this Court to amend the original filing, and to show cause for suit. David Kraybill, being both a citizen and resident of the State of Illinois, U.S.A., and a registered voter in Cook County, Illinois in 2012, now files this complaint against the defendants, David Mains, Donna Daniel, and Affordable Inmate Services, LLC., who are domiciled in the State of Texas, U.S.A.. In regards to Judge J. Phil Gilbert's immediate scrutiny to challenge (sans any response from the defendants) the compliance and cause of the complaint in it's initial filing, make for in and of itself, just cause to grant Plaintiff's motion to appoint counsel before ruling on Order To Show Cause (so as not to put the cart before the horse so-to-speak). Plaintiff has no means whatsoever to investigate, research, or verify the actual residency of the defendants, and in fact may be prohibited from doing so by facility rules. Insofar as the Plaintiff is able to ascertain, all three of the Defendants are residents and citizens of the State of Texas, U.S.A. Plaintiff also has very limited access to a law library to further research accurately, and fairly, the legalities of this case. Therefore, it is in the interest of justice for the court to appoint counsel for the Plaintiff to resolve this suit with expediency.

Before Plaintiff can substantiate all of the various grounds of jurisdictional purview, discovery must be made first [separate motion will be submitted].

Plaintiff now sues for a minimum of seventy-five thousand dollars in damages, costs, and punitive damages, etc. In addition Plaintiff seeks possible class-action status, as admitted by the defendant's own mass-mailing that there are other multiple individuals that are owed money and, or personal property in conjunction with the plaintiff's own losses.

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On prima facie there is ample evidence to suggest losses exceeding seventy-five thousand dollars accumulatively. Another avenue of proceedings now being sought by the Plaintiff is possible Racketeering, Influence, and Corrupt Organization (R.I.C.O.) statutes in relation to civil forfeitures. Plaintiff therefore intends to expand the complaint after further discovery to also include various applicable Federal interstate commerce rules and laws in which this suit may qualify. Plaintiff also claims to pursue any other standings of 42 U.S.C. § 1983 statutes which may apply in addition to any Federal Tort Claims Act, or other applicable laws.

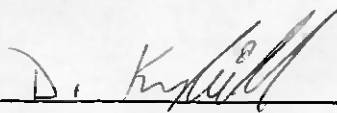
Plaintiff now seeks the Court's permission for interrogatories from the Defendants establishing the due facts of their residency and citizenships, to satiate any court requirement, among other causes.

Plaintiff now changes his original stipulation from a bench trial to a jury trial, as is his preference.

The Plaintiff asks the Court to grant all the hereto requests so as not to shield the Defendants' duplicitous actions from the rule of law. And in all faines to grant the Plaintiff's motion for appointment of counsel to facilitate the rule of law.

The Plaintiff requests an in-person hearing in support of this motion.

Signed



Plaintiff

Date: November 23, 2021